

EXHIBIT A

SUMMONS AND COMPLAINT

Office of the Secretary of State
 Building 1 Suite 157-K
 1900 Kanawha Blvd E
 Charleston, WV 25305



9174-9237 9000 1000 1262 86



Natalie E. Tennant

Secretary of State
 Telephone: 304-558-6000
 Toll Free: 866-SOS-VOTE
 www.wvsos.com

Baker Installation Inc.
 c/o Fredrick P. Baker
 4121 West Washington Rd.
 McMurray PA 15317-2563

ControlNumber: 282042

Defendant: Baker Installation Inc.

Civil Action: 8/17/2009
 09-C-624

I am enclosing:

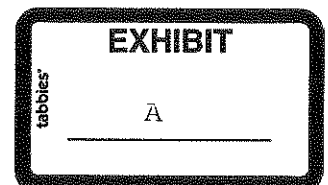
<input type="checkbox"/> summons	<input type="checkbox"/> affidavit	<input checked="" type="checkbox"/> 1 summons and complaint
<input type="checkbox"/> notice	<input type="checkbox"/> answer	<input type="checkbox"/> summons returned from post office
<input type="checkbox"/> order	<input type="checkbox"/> cross-claim	<input type="checkbox"/> summons and amended complaint
<input type="checkbox"/> petition	<input type="checkbox"/> counterclaim	<input type="checkbox"/> 3rd party summons and complaint
<input type="checkbox"/> motion	<input type="checkbox"/> request	<input type="checkbox"/> no return from post office
<input type="checkbox"/> suggestions	<input type="checkbox"/> certified return receipt	<input type="checkbox"/> notice of mechanic's lien
<input type="checkbox"/> interrogatories	<input type="checkbox"/> request for production	<input type="checkbox"/> suggestee execution
<input type="checkbox"/> original	<input type="checkbox"/> request for admissions	<input type="checkbox"/> Other
<input type="checkbox"/> subpoena duces tecum		

which was served on the Secretary at the State Capitol as your statutory attorney-in-fact. According to law, I have accepted service of process in the name and on behalf of your unauthorized foreign corporation.

Please note that this office has no connection whatsoever with the enclosed documents other than to accept service of process in your name and on behalf as your attorney-in-fact. Please address any questions about this document directly to the court or the plaintiff's attorney, shown in the enclosed paper. Please do not call the Secretary of State's office.

Sincerely,

Natalie E. Tennant
 Secretary of State



CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

Marc Dean
514 Main Street
Charleston WV 25313 Plaintiff

Case No. 09-C-624

Baker Installation Inc.
C/o Fredrick P Baker
4121 West Washington Rd
McMurray PA. 1531 Defendant

SUMMONS

To the above-named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby summoned and required to serve upon Erinice L. Green plaintiff's attorney, whose address is P.O. Box 893 Dunbar WV 26046 an answer, including any related counterclaim you may have, to the complaint filed against you in the above styled civil action, a true copy of which is herewith delivered to you. You are required to serve your answer within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint and you will be thereafter barred for asserting in another action any claim you may have which must be asserted by counterclaim in the above styled civil action.

Dated: Aug. 14, 2009

Cathy S. Hattom
Clerk of Court
By Mark D. Bradsher
Deputy Clerk

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

MARC DEAN

Plaintiff

Vs.

BAKER INSTALLATION, Inc.

COMPLAINT

09-C-624

2009 APR -6 PM 4:25
CLERK
KANAWHA COUNTY CIRCUIT COURT

FILED

Plaintiff, Marc Dean, hereinafter referred to as Plaintiff, acting by and through her undersigned counsel, Eunice Green, Esq., files this Original Complaint against Defendants: Baker Installation and for causes of action of race discrimination within the meaning of Title VII of the Civil Rights Act of 1964, as amended, and would and respectfully show the Court as follows:

1. Plaintiff is a resident of Kanawha County, Charleston, West Virginia.
2. Defendant is a corporation doing business in Kanawha County and the State of West Virginia.
3. On about April 24, 2004 plaintiff became an employer of the defendant company as a cable installer.
4. Plaintiff first position was located in Charleston, West Virginia where he worked cable installer after which he was temporally transferred to the Teays Valley office.
5. Upon the request of the management, he was permanently transferred to the Teays Valley office.

6. Initially there were six black males employed by the defendant at the time of his employment.
7. Defendant systematically terminated and/or causes to leave each black employee without chance of return, inclusive of plaintiff.
8. Plaintiff first encounter with the racially hostile environment began soon after he began working.
9. The defendant claimed that plaintiff had left equipment with a customer. Although plaintiff explained that he was instructed to do so by dispatcher, he was forced to sign a disciplinary reprimand under threat of termination.
10. Plaintiff asserts that blacks inclusive of himself were differentially treated than that of his white counterparts.
11. Black employees were directed to work assignments in remote areas of the city where they were subjected to racial harassment.
12. Blacks as that of the plaintiff were given clean up jobs that the white employees had failed to complete and/or had done incorrectly.
13. Blacks employees as that of the plaintiff were treated with disrespect and differentially in situations of disciplinary action and/or termination.
14. On or about June 21, 2007, plaintiff received a complaint that he had failed to complete a job assignment.
15. Subsequent to that complaint, plaintiff accompanied the supervisor

to the site of the alleged complaint and showed supervisor that the job had been completed according to company policy.

16. Supervisor informed plaintiff that he would call into Sudden link and indicate the correction concerning the job completion.

17. However, on or about June 22, 2007 plaintiff was accused of lying on his paper work regarding the completion of the assigned job performance.

18. On the 22nd day of June, plaintiff was unjustly terminated.


19. Plaintiff was subjected to acts of discrimination throughout his employment, which created a hostile working environment.

20. Following his termination, plaintiff has been denied his rightful benefits of vacation and other benefits due him.

21. As a result of the failure of defendant to compensate him for his benefit, defendants continue to discriminate against plaintiff unjustly.

22. Plaintiff was subjected to racial discrimination within the meaning of Title VII of the Civil Rights Act of 1964, as amended.

MARC DEAN
BY COUNSEL


EUNICE L. GREEN#3742
ATTORNEY AT LAW
P. O. BOX 893
Dunbar, WV 25064
304-766-9474

VERIFICATION OF PLEADINGS

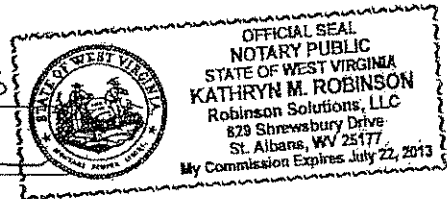
I, Marc Dean after being duly sworn, upon oath, says the facts and allegations contained herein are true, except insofar, as they are therein stated to be upon information and belief, and insofar as they are stated to be upon information ad belief, believes them to be true.

Marc Dean

Taken, subscribed to and sworn before me this 4 day of APRIL, 2009.

My Commission expires:

July 22, 2013



NOTARY PUBLIC